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May 9, 2024

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080**

Dear Judge Martinotti:

In accordance with Paragraph 4(b) of MDL Case Management Order #1, we write on behalf of all parties to provide the following agenda for the case-management conference scheduled for 11:00 a.m. on Tuesday, May 14, 2024.

1. Procedure and timeline for the development of MDL cases.

Plaintiffs' position: Through discussions with Defendants thus far, it is apparent that the parties have a fundamental disagreement as to the most efficient way to develop the cases in this litigation. Plaintiffs believe that the parties would therefore benefit from discussion with the Court to hear the Court's views on the most appropriate process to facilitate the efficient development of this MDL, as well as the timetables for doing so.

Defendants' position: Plaintiffs' assertion that there is a "fundamental disagreement as to the most efficient way to develop the cases" refers to the parties' competing discovery plans. As requested by Judge Singh during the parties April 8, 2024 hearing in this matter, yesterday the parties submitted their respective positions on their competing discovery plans [ECF Nos. 166-68], including disputed issues regarding: (a) the time period for discovery; (b) the relevant drugs at issue; (c) Plaintiffs' request for reproduction of discovery materials from other proceedings; (d) the overall process for discovery; and (e) the overall schedule for the cases. The parties will be discussing their proposals at a discovery conference before Judge Singh on Monday, May 13, 2024. To the extent Your Honor also wishes to discuss those proposals, the parties will be prepared to do so at the May 14 case management conference with Your Honor.

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Also enclosed for the Court's reference is a current MDL case list. We thank the Court for its continued attention to this matter.

Hon. Brian R. Martinotti, U.S.D.J.

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Respectfully submitted,

/s/ James E. Cecchi

James E. Cecchi

*Liaison Counsel for
Third-Party Payer Class Track*

/s/ David R. Buchanan

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*Liaison Counsel for
Self-Funded Payer Track*

/s/ Joanne Cicala

Joanne Cicala

*Liaison Counsel for
State Attorney General Track*

/s/ John D. Tortorella

John D. Tortorella

Enclosure

cc: Honorable Rukhsanah L. Singh, U.S.M.J. (*via ECF*)
Counsel of Record (*via ECF*)

In re Insulin Pricing Litigation (MDL No. 3080)**Case No. 2:23-md-03080-BRM-RLS****Case List as of May 9, 2024**

Case Name	Case No.
Self-Funded Payer Track Cases	
County of Monmouth, New Jersey v. Eli Lilly and Company, et al.	2:23-cv-03916
Cattaraugus County, New York v. Eli Lilly and Company, et al.	2:23-cv-04384
Jackson County, Missouri v. Eli Lilly and Company, et al.	2:23-cv-04531
City of Cleveland, Ohio v. Eli Lilly and Company, et al.	2:23-cv-04544
County of Albany, New York v. Eli Lilly and Company, et al.	2:23-cv-07042
Lake County, Illinois v. Eli Lilly and Company, et al.	2:23-cv-08487
Bossier Parish v. Eli Lilly and Company, et al.	2:23-cv-10910
Steuben County, New York v. Eli Lilly and Company, et al.	2:23-cv-18249
Cortland County, New York v. Eli Lilly and Company, et al.	2:23-cv-18314
Livingston County, New York v. Eli Lilly and Company, et al.	2:23-cv-18351
Schenectady County, New York v. Eli Lilly and Company, et al.	2:23-cv-20375
Cuyahoga County v. Eli Lilly and Company, et al.	2:23-cv-21082
King County v. Eli Lilly and Company, et al.	2:23-cv-21178
Pinellas County, Florida v. Eli Lilly and Company, et al.	2:23-cv-21381
City of Alexandria, Virginia v. Eli Lilly and Company, et al.	2:23-cv-22769
County Board of Arlington County, Virginia v. Eli Lilly and Company, et al.	2:23-cv-22776
Spokane County v. Eli Lilly and Company, et al.	2:23-cv-22847
Board of County Commissioners of Washington County, Maryland v. Eli Lilly and Company, et al.	2:23-cv-22917
Henrico County, Virginia v. Eli Lilly and Company, et al.	2:23-cv-23042
The Board of County Commissioners of St. Mary's County, Maryland v. Eli Lilly and Company, et al.	2:23-cv-23090
Anne Arundel County, Maryland v. Eli Lilly and Company, et al.	2:24-cv-00384
County of Wayne, Michigan v. Eli Lilly and Company, et al.	2:24-cv-00523
City of Roanoke, Virginia et al. v. Eli Lilly and Company, et al.	2:24-cv-00559

Case Name	Case No.
Erie County, New York v. Eli Lilly and Company, et al.	2:24-cv-00632
Onondaga County, New York v. Eli Lilly and Company, et al.	2:24-cv-00646
Niagara County, New York v. Eli Lilly and Company, et al.	2:24-cv-00652
Broome County, New York v. Eli Lilly and Company, et al.	2:24-cv-00692
Oneida County, New York v. Eli Lilly and Company, et al.	2:24-cv-00694
Washtenaw County, Michigan, et al. v. Eli Lilly and Company, et al.	2:24-cv-00717
Macomb County, Michigan v. Eli Lilly and Company, et al.	2:24-cv-00719
Monroe County, Michigan v. Eli Lilly and Company, et al.	2:24-cv-00720
LDG Medical Services Group, L.L.C., et al. v. Eli Lilly and Company, et al.	2:24-cv-00725
Warren County, New York v. Eli Lilly and Company, et al.	2:24-cv-00992
St. Louis County, Missouri v. Eli Lilly and Company, et al.	2:24-cv-04615
Mayor & City Council of Baltimore v. Eli Lilly & Company, et al.	2:24-cv-05099
City of Lorain, Ohio v. Eli Lilly and Company, et al.	2:24-cv-05002
State Attorney General Track Cases	
State of Montana, ex rel. Austin Knudsen v. Eli Lilly and Company, et al.	2:23-cv-04214
State of Kansas, ex rel., Kris W. Kobach, Attorney General v. Eli Lilly and Company, et al.	2:23-cv-04219
State of Arkansas, ex rel. Tim Griffin, Attorney General v. Eli Lilly and Company et al.	2:23-cv-04239
State of Illinois, ex rel. Raoul v. Eli Lilly and Company et al.	2:23-cv-04242
State of Mississippi, ex rel. Lynn Fitch Attorney General v. Eli Lilly and Company et al.	2:23-cv-04364
State of Kentucky, ex rel. Daniel Cameron v. Novo Nordisk Inc., et al.	2:23-cv-21374
The State of Louisiana v. Sanofi-Aventis U.S. LLC et al.	2:23-cv-22978
Arizona v. Optum Incorporated et al.	2:24-cv-00260
State of Utah et al. v. Eli Lilly and Company et al.	2:24-cv-00536

Case Name	Case No.
Third-Party Payer Class Track Cases	
Sheet Metal Workers Local No. 25 Health and Welfare Fund v. Eli Lilly and Company, et al.	2:23-cv-14371
Local 464A UFCW Welfare Services and Benefit Funds individually and on behalf of all other similarly situated v. Eli Lilly and Company, et al.	2:23-cv-20842
Local 837 Health and Welfare Plan, individually and on behalf of all other similarly situated v. Eli Lilly and Company, et al.	2:23-cv-20932
Local No. 1 Health Fund, and Plan of Benefits for the Local No. 1 Health Fund, individually and on behalf of all others similarly situated v. Eli Lilly and Company, et al.	2:23-cv-21160
Indiana/Kentucky/Ohio Regional Council of Carpenters Welfare Fund, individually and on behalf of all others similarly situated v. Eli Lilly and Company, et al.	2:23-cv-22305